

1. On December 15, 2016, the parties stipulated to a narrowing of Plaintiff's remaining Freedom of Information Act ("FOIA") request, as set forth in a Joint Status Report, *see* ECF No. 41.
2. In the parties' last Joint Status Report, dated April 17, 2017 (ECF No. 45), Defendant reported that its processing of the first batch of documents responsive to Plaintiff's narrowed FOIA request remained on track for completion on or before May 26, 2017. The parties requested, and the Court ordered (ECF No. 46) that the parties file a joint status report on or before June 16, 2017.
3. On May 25, however, Defendant filed an Unopposed Administrative Motion for an Extension of the Deadline for Filing a Joint Status Report (ECF No. 47) from June 16 to June 21 to allow additional time to complete the deliberations necessary to determine whether the Government was able to release more information within previously identified responsive documents in its forthcoming FOIA production.
4. The Court granted the administrative motion and reset the deadline for filing the Joint Status Report to June 21, 2017. *See* Minute Entry Order, dated May 30, 2017.
5. Subsequently, on June 13, Defendant produced the first batch of responsive documents to Plaintiff.
6. Defendant estimates that it will complete the processing of, and produce to Plaintiff, as appropriate, the second batch of documents responsive to Plaintiff's narrowed FOIA request on or before September 14, 2017. As the parties noted in their prior joint status report, *see* ECF No. 45 ¶ 4, Defendant will thereafter begin processing a third and final batch, consisting of all remaining responsive records. As with the second batch, the parties will confer concerning a schedule for completing processing.
7. The parties propose to file joint status reports to update the Court on the progress of this case on July 19, 2017 and September 28, 2017.

Dated: June 21, 2017

Respectfully submitted,
/s Mark Rumold
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DECLARATION PURSUANT TO LOCAL RULE 5-1(I)(3)

Pursuant to Civil L.R. 5-1(i)(3), I, Julia Berman, declare that I obtained the concurrence of Mark Rumold, counsel for Plaintiff Electronic Frontier Foundation, in the filing of this document.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 21st day of June, 2017 in Destin, Florida.

DATED: June 21, 2017

Respectfully submitted,

By */s/ Julia Berman*
JULIA BERMAN